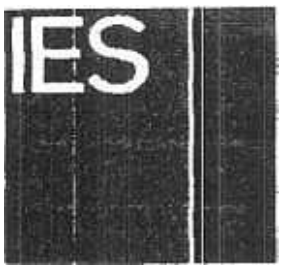

Illuminating Engineering Society of North America

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CALIF ENERGY COMMISSION

JUN 19 2002

RECEIVED IN DOCKETS

June 14, 2002

To: California Energy Commission

From: Doug Paulin

Re: IESNA RP2-01 and IESNA RP33-99

These two documents, published by IESNA contain some overlapping and seemingly conflicting recommendations. I would like to take this opportunity to explain how these came to be, and add some interpretation, or information that can be used in interpretation.

RP33 was published in 1999. It was written by the Outdoor Environmental Lighting Committee. This committee's focus is on the visual use and enjoyment of the nighttime environment. One of the committee's tasks was to harmonize the various uses of the outdoor environments, such as roadways, parking lots, parks, sports, commercial interests and astronomical observatories. The uses are thus disparate, making "harmony" a difficult task. The make-up of the committee is of Designers, Manufacturers, and other interested parties such as educators, researchers and special interest organizations. This document was balloted at the committee level, the Technical Review Council and the Board of Directors.

RP2 was published in 2001. It was written by the Merchandising Lighting Committee. This committee's focus is on the best use of lighting in the Merchandising and Retail applications. This committee's work represents the definitive knowledge on lighting to enhance retail spaces and encourage all parts of the retail process. The make-up of the committee is Designers, Manufacturers and other interested parties such as educators and researchers. This document was balloted at the committee level, the Technical Review Council and the Board of Directors. It was then forwarded to the ANSI Board of Standards Review, where it was exposed for public review. ANSI then reviewed comments from the public, the IESNA Board of Directors, the Technical Review Council and the Merchandise Lighting Committee. Furthermore, ANSI reviewed all of the balloting, response and resolution of comments, including the make-up and balance of the committee. It became an ANSI Standard Practice.

The recommendations that overlap or appear to be in conflict can be found in the outdoor merchandising area, specifically on outdoor automobile sales lots and petroleum stations.
In simple terms, each committee brought their unique focus in the *priorities* of design criteria for these lighting applications. RP33 recommends illuminance values that are far lower than RP2. This is because the environment was their top priority. These values still have merit in non-commercial areas where the environment is the top priority of the users of those areas. RP2 recommends higher values than RP33 because the top priority for that committee was to help develop lighting designs that would enable retail commercial businesses to compete favorably in areas with other commercial businesses. These higher values have merit in developed commercial areas where commercial interests hold the top priority. If one were forced to rationalize the two sets of illuminance recommendations, the total range should be

expanded to include the highest values from RP2 and the lowest values of RP33. This then requires the designer to take the utmost care in selecting values closest to those fitting the "norm" in the area around these businesses.

To restrict the upper limit of lighting levels can be a good thing, if it does not unreasonably restrict the trade of a commercial business in the presence of "grand fathered" competitive businesses. In the absence of statutes requiring these businesses to all comply with the same lighting standard, the business plans of new retail enterprises can become untenable.